

State of California
Regional Water Quality Control Board
San Diego Region

REVISED

EXECUTIVE OFFICER SUMMARY REPORT
November 13, 2002

ITEM: 15

SUBJECT: Waste Discharge Requirements: Lake Cuyamaca Recreation and Park District, Lake Cuyamaca Public Recreation Area, Southeast of Julian, San Diego County (Tentative Order No. R9-2002-0343) (*Bryan Ott*)

PURPOSE: To adopt waste discharge requirements for the treatment and disposal of sewage via septic system and subsurface disposal leach field infiltration system.

PUBLIC NOTICE: The November 13, 2002 Regional Board meeting agenda notice that was sent on October 31, 2002 served as the required 10-day official public notification for this action. Tentative drafts of the Order, including the draft monitoring and reporting program (M&RP), were mailed on October 25, 2002 to the discharger and all known interested parties and agencies for review and comment. Copies of the tentative Order and M&RP have been made available for public review at the San Diego Regional Water Quality Control Board office.

DISCUSSION: On October 31, 2001, the Lake Cuyamaca Recreation and Park District (hereinafter discharger) submitted to this Regional Board an incomplete Report of Waste Discharge prepared by Kennedy/Jenks Consultants for a proposed septic tank with a subsurface disposal leach field infiltration system. On January 28, 2002, the discharger submitted a complete Report of Waste Discharge.

The Report of Waste Discharge indicates that wastewater generated from the south and north shore facilities, which include a restaurant, public restrooms, and fish cleaning stations, will be collected in holding tanks, pumped out as needed, and transported by truck to the proposed waste disposal system in the San Diego Region. The proposed waste disposal system consists of an 8,000-gallon surge tank, an 8,000-gallon septic tank, and a subsurface disposal leach field infiltration

system. Land is available for a reserve leach field in accordance with County of San Diego requirements. The proposed leach field site begins approximately 850 feet northwesterly of the intersection of Highway 79 and Sunrise Highway (Route S-1) and extends approximately 800 feet to the north. Sited at the approximate elevation of 4,775 feet, the system is located more 1,500 feet up gradient of the high water line of Lake Cuyamaca, a recreational and municipal water supply reservoir, and 50 feet higher than the high water level (spillway elevation). The leach line disposal system site slopes vary from 10 to 20% toward Highway 79.

The discharger owns and will operate the septic system and subsurface disposal leach field infiltration system, which has been designed to treat a maximum of 8,000 gallons per day. Treated effluent is to be discharged in the Boulder Creek Hydrologic Area Hydrologic Area (HA 907.40) of the San Diego River Hydrologic Unit (HU 907.00).

The effluent specifications contained in tentative Order No. R9-2002-0343 for the discharge of treated wastewater to the land were developed using water quality data supplied in the Report of Waste Discharge and the assessment of available assimilative capacity of the soil and groundwater such that groundwater would not exceed Basin Plan water quality objectives, principally for nitrogen and total dissolved solids.

The RWD indicates that recreational vehicles (RV) holding tank wastes are present in the wastewater to be discharged to the subsurface disposal system. Chemical preservatives in RV holding tanks pose a significant threat to water quality. Chemicals, such as formaldehyde, formalin, and para-dichlorobenzene, undermine the septic system treatment process by destroying bacteria used to treat and degrade the domestic waste, rendering the wastewater treatment system ineffective. Furthermore, these chemicals are not readily removed in the subsurface biological treatment process and thus could be transported to the groundwater and surface waters in the vicinity of the discharge. Due to the proximity of the proposed disposal facility to a water supply reservoir (Lake Cuyamaca) and the potential for these chemicals to adversely affect both surface and ground water quality, the discharge of RV holding tank waste to the septic tank and leach line systems would be prohibited by this Order.

Several citizens residing near the proposed disposal site have raised a number of concerns about the project and its potential impacts to the community and the environment. It should be noted that 2,100 acres of land, known as the Tulloch Ranch, which is on the northern edge of the Cuyamaca Reservoir, was purchased by the Nature Conservancy via a loan from the State Water Resources Control Board on January 16, 2002 to protect the watershed from degradation (see supporting documents 3 and 5). The Nature Conservancy was unable to purchase the 31-acre site where the discharger has proposed to construct the septic tank and subsurface disposal leach field infiltration system. Also, the land in question to be used by the discharger for wastewater treatment and disposal may be restricted by a Williamson Act contract. Under a Williamson Act contract, the land can be designated as an agricultural preserve, thus disallowing any public improvements to be made as long as the land is under contract. A Williamson Act contract is an enforceable restriction pursuant to Article XIII, Section B of the California Constitution and Section 51252 (see supporting document 4). Staff will attempt to clarify the possible designation of the discharger's land the Williamson Act.

Comments on the tentative Order were received. Staff considered the comments, and responses to the comments were sent to the discharger and interested parties. An errata sheet has been prepared containing proposed revisions to the tentative Order in response to some of the comments received as well as additions and clarifications from staff. The revisions are minor and have no impact on the intent of the tentative Order.

LEGAL CONCERNS:

Clarification may be needed regarding designation under the Williamson Act.

SUPPORTING DOCS:

1. Tentative Order No. R9-2002-0343 including Monitoring and Reporting Program No. 2002-0343 with transmittal letter.
2. Site Map.
3. Letter from The Nature Conservancy dated October 25, 2002.
4. Letter from the Department of Conservation, State of California dated July 1, 2002.
5. News article dated February 6, 2002.
- 6. Transmittal letter for responses to comments and errata sheet dated November 7, 2002.**
- 7. Responses to comments**
- 8. Errata sheet containing proposed revisions to tentative Order R9-2002-0343.**

- 9. Comment letter dated November 5, 2002 from the Sierra Club, San Diego Chapter.**
- 10. Comment letter dated November 1, 2002 from Kennedy/Jenks Consultants.**
- 11. Comment letter from Race H. Paddock, District Board Member – Lake Cuyamaca Recreation and Park District.**
- 12. Email transmittal of comments from USEPA dated November 4, 2002.**
- 13. Comment letter dated May 20, 2002 from Helix Water District.**
- 14. USEPA Inventory of Injection Wells form.**
- 15. Notice of Negative Declaration filed on May 23, 2001.**

RECOMMENDATION:

Staff has considered the existence of underlying fractured bedrock of the site, the proximity of the disposal site to Lake Cuyamaca, and the potential for RV holding tank chemical wastes entering the disposal system that could result in contamination of the Lake and groundwater underlying the treatment system. Staff believes, however, that Tentative Order No. R9-2002-0343 adequately addresses these concerns and would protect water quality.